

1 **06-CV-05078-ORD**

FILED RECEIVED	LODGED
AUG 30 2007	
CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT BY TACOMA DEPUTY	

2

3

4

5

6

7

Hon. Ronald B. Leighton

8

9

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON AT TACOMA

10

EMMA MANNING,

11

Plaintiff,

12

vs.

13

TACOMA PUBLIC SCHOOLS, JAMES
SHOEMAKE, SUPERINTENDENT; SAM
BELL, EXECUTIVE DIRECTOR OF
BUILDINGS & GROUNDS; KEN PRICE,
DIRECTOR; MARGARET OHLSON,
SUPERVISOR; RICHARD WATSON,
SUPERVISOR; SUSAN LARSON,
MAINTENANCE CLERK; AND ANY
UNKNOWN PARTIES,

17

Defendants.

19

THIS MATTER having come on regularly before the undersigned judge of the above-entitled Court upon Defendants Motions in Limine, and the Court having reviewed the documents filed in support of the motion, including:

20

21

22

23

24

25

1. Defendants' Motions in Limine;
2. Declaration of Patricia K. Buchanan in Support of Defendants' Motions in Limine, with attached exhibits;

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

(PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - I

Two Union Square - 601 Union Street, Suite 4200
Seattle, WA 98101 Tel. 206.652.3500 • Fax 206.652.3501

1
2 3. _____
3 4. _____
4 5. _____

5 The Court, having also heard the arguments of counsel for the various parties, hereby
6 ORDERS, ADJUDGES, AND DECREES that defendants' motions in limine are hereby
7 granted, denied, and reserved as follows:

- 8 A. All non-party witnesses should be excluded from the courtroom during the
9 course of trial.
10 Granted [] Denied [] Reserved
11 B. Parties should be required to give 24-hour notice of witnesses, deposition,
12 and exhibits to be called or used at trial.
13 Granted [] Denied [] Reserved
14 C. Any argument the plaintiff intends to make to the Court on damages should
15 be made in his closing argument and not introduced in rebuttal.
16 Granted [] Denied [] Reserved
17 D. Medical records should be excluded as evidence, or redacted, to the extent
18 they contain hearsay or expressions of opinion, conjecture, or speculation if
19 they are merely cumulative of the testimony of plaintiff or her witnesses.
20 [] Granted [] Denied Reserved
21 E. Any mention of defendants' financial status or the relative impecuniosity of
22 plaintiff should be excluded.
23 Granted [] Denied [] Reserved
24 F. There should be no display of exhibits until admitted into evidence, or until
25 permission has been obtained from the Court.
26 Granted [] Denied [] Reserved
27 G. Plaintiff should not be able to use past alleged bad acts as proof of
28 conformity therewith.
29 [] Granted [] Denied Reserved

(PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - 2

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

Two Union Square - 601 Union Street, Suite 4200
Seattle • WA • 98101 Tel. 206.652.3500 • Fax 206.652.3501

1 **H.** There should be no mention that these motions, or others, have been filed
2 and argued before the Court.
3

4 Granted [] Denied [] Reserved
5

6 **I.** There should be no reference to the discovery process or discovery disputes.
7

8 [] Granted [] Denied Reserved
9

10 **J.** This Court should exclude any references to Ms. Manning's alleged
11 litigation-induced stress.
12

13 [] Granted [] Denied Reserved
14

15 **K.** Specific testimony that defendants seek to exclude as provided in Exhibit 1
16 to the Declaration of Patricia K. Buchanan in Support of Defendants'
17 Motions in Limine:
18

19 **I. EMMA MANNING VOL. 1**

20 A. 32:17-19 (Expert opinion testimony by lay witness, Foundation, Speculation)
21

22 [] Granted [] Denied Reserved
23

24 B. 35:18-36:3 (Lacks personal knowledge, Foundation, Speculation)
25

26 [] Granted [] Denied Reserved
27

28 C. 48:20-49:13 (Hearsay, Speculation, Lacks personal knowledge, Foundation)
29

30 [] Granted [] Denied Reserved
31

32 D. 50:13-51:9 (Hearsay, Foundation, Speculation, Lacks personal knowledge)
33

34 [] Granted [] Denied Reserved
35

36 E. 55:3-5 (Hearsay, Speculation, Lacks personal knowledge)
37

38 [] Granted [] Denied Reserved
39

40 F. 55:6-20 (Speculation, Lacks personal knowledge, Foundation)
41

42 [] Granted [] Denied Reserved
43

1 G. 81:19-83:2 (Speculation, Lacks personal knowledge, Foundation)

2 Granted Denied Reserved

3 H. 88:4-14 (Speculation, Lacks personal knowledge, Foundation)

4 Granted Denied Reserved

5 I. 111:9-19 (Improper expert opinion from lay witness, Speculation, Lacks personal
6 knowledge, Foundation)

7 Granted Denied Reserved

8 J. 112:16-114:18 (Foundation, Lacks personal knowledge, Speculation, Hearsay)**Error!**
9 **Bookmark not defined.**

10 Granted Denied Reserved

11 K. 117:14-24 (Improper expert opinion from lay witness, Speculation, Lacks Personal
12 Knowledge, Foundation)

13 Granted Denied Reserved

14 L. 129:4-8 (Hearsay, Speculation, lacks personal knowledge)

15 Granted Denied Reserved

16 M. 136:5-16 (Speculation, Lacks personal knowledge, foundation)

17 Granted Denied Reserved

18 N. 145:12-146:22 (Speculation, Lacks personal knowledge)

19 Granted Denied Reserved

20 O. 154:19-24 (Speculation, Lacks personal knowledge, Foundation)

21 Granted Denied Reserved

22 (PROPOSED) ORDER GRANTING DEFENDANTS'
23 MOTIONS IN LIMINE - 4

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

24 Two Union Square - 601 Union Street, Suite 4200
Seattle - WA - 98101 Tel. 206.652.3500 • Fax 206.652.3501

1 II. EMMA MANNING VOL. II

2 A. 19:22-20:13 (Improper expert opinion from lay witness, Speculation, Hearsay)

3 [] Granted [] Denied Reserved

4 B. 26:1-11 (hearsay)

5 [] Granted [] Denied Reserved

6 C. 60:8-17 (Hearsay)

7 [] Granted [] Denied Reserved

8 D. 70:12-19 (Hearsay)

9 [] Granted [] Denied Reserved

10 E. 76:2-10 (Lacks personal knowledge, Speculation, Foundation, Relevance, Prejudice,
11 Fed. R. Evid. 403)

12 [] Granted [] Denied Reserved

13 F. 77:6-78:9 (Lacks personal knowledge, Speculation, Foundation, Relevance, Prejudice,
14 Fed. R. Evid. 403)

15 [] Granted [] Denied Reserved

16 G. 85:15-86:8 (Hearsay, Speculation, Lacks personal knowledge, Improper expert opinion
17 from lay witness)

18 [] Granted [] Denied Reserved

19 H. 94:2-7 (Hearsay, Lacks personal knowledge, Speculation)

20 [] Granted [] Denied Reserved

1 I. 109:6-13 (Hearsay)

2 Granted Denied Reserved

3 J. 129:24-130:9 (Hearsay, Lacks personal knowledge, Speculation)

4 Granted Denied Reserved

5 K. 158:5-14 (Hearsay)

6 Granted Denied Reserved

7 **III. RICHARD M. LONG**

8 A. 5:23-6:12 (Relevance, Hearsay)

9 Granted Denied Reserved

10 B. 6:16-18 (Relevance)

11 Granted Denied Reserved

12 C. 6:24-7:2 (Relevance)

13 Granted Denied Reserved

14 D. 7:11-16 (Non-responsive, Relevance)

15 Granted Denied Reserved

16 E. 7:23-8:1 (Hearsay)

17 Granted Denied Reserved

18 F. 9:12-13 (Non-responsive, Hearsay)

19 Granted Denied Reserved

20
21
22
23
24
25

(PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - 6

PATTERSON BUCHANAN
FIDGES LEITCH KALZER & WAECHTER

Two Union Square - 601 Union Street, Suite #200
Seattle - WA - 98101 Tel. 206.652.3500 - Fax 206.652.3501

1 G. 11:21-12:3 (Foundation, Non-responsive)

2 Granted Denied Reserved

3 H. 13:16-20 (Foundation)

4 Granted Denied Reserved

5 I. 14:4-7 (Hearsay)

6 Granted Denied Reserved

7 J. 14:14-17 (Foundation, Hearsay)

8 Granted Denied Reserved

9 K. 16:21-24 (Non-responsive, Relevance)

10 Granted Denied Reserved

11 L. 18:9-17 (Relevance)

12 Granted Denied Reserved

13 M. 21:4-7 (Hearsay)

14 Granted Denied Reserved

15 N. 23:19-24:5 (Hearsay, Foundation)

16 Granted Denied Reserved

17 O. 24:19-25:7 (Foundation, Hearsay)

18 Granted Denied Reserved

1 P. 25:17-26:1 (Foundation, Hearsay)

2 Granted Denied Reserved

3 Q. 27:1-12 (Foundation)

4 Granted Denied Reserved

5 R. 27:24-28:14 (Relevance, Foundation)

6 Granted Denied Reserved

7 S. 28:13-29:19 (Relevance, Non-responsive)

8 Granted Denied Reserved

9 T. 31:14-16 (Hearsay, in-part)

10 Granted Denied Reserved

11 U. 32:3-10 (Foundation, Hearsay)

12 Granted Denied Reserved

13 V. 32:16-19 (Hearsay)

14 Granted Denied Reserved

15 W. 32:22-24 (Hearsay)

16 Granted Denied Reserved

17 X. 33:9-20 (Hearsay)

18 Granted Denied Reserved

19
20
21
22
23
24
25

(PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - 8

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

Two Union Square - 601 Union Street, Suite 4200
Seattle, WA 98101 Tel. 206.652.3500 Fax 206.652.3501

1 Y. 34:24-35:16 (Hearsay)

2 [] Granted [] Denied Reserved

3 Z. 36:20-21 (Hearsay)

4 [] Granted [] Denied Reserved

5 AA.37:6-8 (Non-responsive)

6 [] Granted [] Denied Reserved

7 BB.39:20-23 (Foundation)

8 [] Granted [] Denied Reserved

9 CC.40:21-41:2 (Foundation)

10 [] Granted [] Denied Reserved

11 DD.43:15-16 (Hearsay)

12 [] Granted [] Denied Reserved

13 EE. 47:13-14 (Hearsay, Foundation)

14 [] Granted [] Denied Reserved

15 FF. 48:18-49:15 (Hearsay, Foundation, Relevance)

16 [] Granted [] Denied Reserved

17 GG.50:4-11 (Foundation, Hearsay)

18 [] Granted [] Denied Reserved

1 HH.51:9-14 (Foundation)

2 Granted Denied Reserved

3 II. 52:15-19 (Non-responsive)

4 Granted Denied Reserved

5 JJ. 54:3-4 (Foundation, Hearsay)

6 Granted Denied Reserved

7 KK.54:13-16 (Foundation, Hearsay)

8 Granted Denied Reserved

9 LL. 56:20-23 (Foundation)

10 Granted Denied Reserved

11 MM. 57:3-10 (Foundation)

12 Granted Denied Reserved

13 NN.57:20-58:11 (Hearsay)

14 Granted Denied Reserved

15 OO.58:14-16 (Foundation)

16 Granted Denied Reserved

17 PP. 59:22-60:2 (Foundation, Hearsay)

18 Granted Denied Reserved

19
20
21
22
23
24
25

(PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - 10

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

Two Union Square - 601 Union Street, Suite 4200
Seattle - WA - 98101 Tel. 206.652.3500 - Fax 206.652.3501

1 QQ.60:7-12 (Speculation, Foundation)

2 Granted Denied Reserved

3 RR.62:1-2 (Hearsay)

4 Granted Denied Reserved

5 **IV. KEN PRICE**

6 A. 8:4-16 (Foundation)

7 Granted Denied Reserved

8 B. 10:9-11:4 (Foundation, Speculation)

9 Granted Denied Reserved

10 C. 19:3-10 (Foundation)

11 Granted Denied Reserved

12 D. 21:2-22:24 (Foundation)

13 Granted Denied Reserved

14 E. 24:6-25:20 (Foundation)

15 Granted Denied Reserved

16 F. 29:13-19 (Hearsay)

17 Granted Denied Reserved

18 G. 30:18-31:9 (Foundation)

19 Granted Denied Reserved

20 (PROPOSED) ORDER GRANTING DEFENDANTS'
21 MOTIONS IN LIMINE - 11

22 PATTYERSON BUCHANAN
23 FOBBES LEITCH KALZER & WAECHTER
24

25 Two Union Square - 601 Union Street, Suite 4200
Seattle - WA - 98101 Tel. 206.652.3500 • Fax 206.652.3501

1 H. 35:3-10 (Foundation)

2 Granted Denied Reserved

3 I. 38:23-39:1 (Foundation)

4 Granted Denied Reserved

5 J. 42:16-24 (Foundation, Legal Speculation)

6 Granted Denied Reserved

7 K. 44:10-18 (Foundation)

8 Granted Denied Reserved

9 **V. DEBBRA A. LONG**

10 Granted Denied Reserved

11 A. 6:19-22 (Foundation)

12 Granted Denied Reserved

13 B. 7:4-9 (Foundation)

14 Granted Denied Reserved

15 C. 11:3-6 (Hearsay)

16 Granted Denied Reserved

17 D. 13:19-23 (Hearsay, Lacks personal knowledge)

18 Granted Denied Reserved

1 E. 14:13-20 (Foundation)

2 Granted Denied Reserved

3 F. 16:15-23 (Foundation)

4 Granted Denied Reserved

5 G. 17:9-24 (Foundation)

6 Granted Denied Reserved

7 H. 18:21-19:12 (Hearsay)

8 Granted Denied Reserved

9 I. 21:13-20 (Hearsay)

10 Granted Denied Reserved

11 J. 22:25-23:5 (Relevance)

12 Granted Denied Reserved

13 K. 24:25-25:1 (Foundation)

14 Granted Denied Reserved

15 L. 28:11-18 (Hearsay)

16 Granted Denied Reserved

17 M. 34:18-22 (Relevance, Hearsay)

18 Granted Denied Reserved

1 N. 38:15-17 (Foundation)

2 Granted Denied Reserved

3 O. 44:15-45:2 (Foundation)

4 Granted Denied Reserved

5 P. 45:13-20 (Hearsay)

6 Granted Denied Reserved

7 Q. 46:4-7 (Relevance)

8 Granted Denied Reserved

9 R. 46:15-19 (Foundation)

10 Granted Denied Reserved

11 S. 46:25-47:3 (Foundation)

12 Granted Denied Reserved

13 T. 47:17-48:5 (Foundation, Hearsay)

14 Granted Denied Reserved

15 U. 48:15-19 (Foundation)

16 Granted Denied Reserved

17 V. 49:5-17 (Calls for a legal conclusion)

18 Granted Denied Reserved

19 (PROPOSED) ORDER GRANTING DEFENDANTS'
20 MOTIONS IN LIMINE - 14

21 PATTYERSON BUCHANAN
22 FOBBES LEITCH KALZER & WAECHTER

23 Two Union Square - 601 Union Street, Suite 4200
Seattle - WA - 98101 Tel. 206.652.3500 - Fax 206.652.3501

1 W. 50:9-17 (Hearsay)

2 [] Granted [] Denied Reserved

3 **VI. MARGARET OHLSON**

4 A. 13:3-18 (Foundation)

5 [] Granted [] Denied Reserved

6 B. 76:4-8 (Relevance)

7 [] Granted [] Denied Reserved

8 C. 81:18-84-5 (Incomplete hypothetical, Foundation)

9 [] Granted [] Denied Reserved

10 **VII. DIANE M. SCHMIDTKE**

11 A. 79:1-10 (Foundation, Improper hypothetical, Assumes facts not in evidence)

12 [] Granted [] Denied Reserved

13 B. 73:11-23 (Foundation, Improper hypothetical, Assumes facts not in evidence)

14 [] Granted [] Denied Reserved

15 C. 80:13-15 (Foundation)

16 [] Granted [] Denied Reserved

17 D. 81:3-14 (Argumentative, Foundation, Assumes facts not in evidence, Speculation, Lacks personal knowledge)

18 [] Granted [] Denied Reserved

19 E. 81:15-19 (Speculation, Argumentative, Lacks personal knowledge, Foundation)

20 [] Granted [] Denied Reserved

(PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - 15

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

Two Union Square - 601 Union Street, Suite 4200
Seattle - WA - 98101 Tel. 206.652.3500 - Fax 206.652.3501

1

2 F. 84:6-85:10 (Relevance, Speculation, Lacks personal knowledge, Foundation)

3 [] Granted [] Denied Reserved

4 G. 86:14-87:1 (Relevance, Speculation, Lacks personal knowledge, foundation)

5 [] Granted [] Denied Reserved

6 H. 87:9-88:2 (Relevance, Speculation, Lacks personal knowledge, Foundation)

7 [] Granted [] Denied Reserved

8 I. 88:3-89:5 (Relevance, Speculation, Lacks personal knowledge, Foundation)

9 [] Granted [] Denied Reserved

10 J. 89:6-89:17 (Relevance, Assumes facts not in evidence, Speculation, Lacks personal
knowledge, Foundation)

11 [] Granted [] Denied Reserved

12 K. 89:18-90:17 (Relevance, Assumes facts not in evidence, Speculation, Lacks personal
knowledge, Foundation)

13 [] Granted [] Denied Reserved

14 L. 91:16-92:2 (Relevance, Improper hypothetical, Foundation)

15 [] Granted [] Denied Reserved

16 M. 93:15-94:8 9Speculation, Foundation, Lacks personal knowledge, Relevance)

17 [] Granted [] Denied Reserved

18 N. 98:3-7 (Relevance)

19 [] Granted [] Denied Reserved

(PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - 16

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

Two Union Square - 601 Union Street, Suite 4200
Seattle - WA - 98101 Tel. 206.652.3500 - Fax 206.652.3501

1
2 **VIII. RICHARD WATSON**

3 A. 19:8-19 (Foundation)

4 [] Granted [] Denied Reserved

5 B. 23:14-24:2 (Foundation)

6 [] Granted [] Denied Reserved

7 C. 28:5-25 (Foundation)

8 [] Granted [] Denied Reserved

9 D. 38:15-23 (Calls for a legal conclusion)

10 [] Granted [] Denied Reserved

11 E. 51:14-20 (Foundation)

12 [] Granted [] Denied Reserved

13 F. 52:11-17 (Foundation, Hearsay)

14 [] Granted [] Denied Reserved

15 G. 53:5-9 (Foundation)

16 [] Granted [] Denied Reserved

17 **IX. LaDONNA L. ALSTON**

18 A. 15:14-16:19 (Hearsay, Lack of personal knowledge, Speculation, Foundation)

19 [] Granted [] Denied Reserved

20 B. 18:8 – 20:2 (Hearsay, Lack of personal knowledge, Speculation, Foundation)

21 [] Granted [] Denied Reserved

(PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - 17

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

Two Union Square - 601 Union Street, Suite 4200
Seattle - WA - 98101 Tel. 206.652.3500 • Fax 206.652.3501

C. 20:22-22:20 (Hearsay, Lacks personal knowledge, Speculation, Foundation)

[] Granted [] Denied Reserved

D. 23:18-24:5 (Hearsay, Lacks personal knowledge, Speculation, Foundation)

[] Granted [] Denied Reserved

E. 35:3-36:8 (Hearsay, Lacks personal knowledge, Speculation, Foundation, Relevance)

[] Granted [] Denied Reserved

X. SUSAN LARSON

A. 10:15-11:1 (Foundation)

[] Granted [] Denied Reserved

B. 25:22-26:5 (Foundation, Relevance, Speculation)

[] Granted [] Denied Reserved

C. 34:24-35:14 (Foundation)

[] Granted [] Denied Reserved

D. 37:19-38:3 (Foundation)

[] Granted [] Denied Reserved

XI. ANDREW HWANG, M.D.

A. 18:23-19:9 (Relevance)

[] Granted [] Denied Reserved

B. 21:23-22:20 (Relevance)

[] Granted [] Denied Reserved

(PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - 18

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

Two Union Square - 601 Union Street, Suite 4200
Seattle - WA - 98101 Tel. 206.652.3500 - Fax 206.652.3501

1
2 C. 27:9-16 (Relevance)

3 Granted Denied Reserved

4
5 D. 38:20-41:4 (Relevance)

6 Granted Denied Reserved

7 E. 41:11-15 (Relevance)

8 Granted Denied Reserved

9
10 F. 46:19-49:5 (Relevance)

11 Granted Denied Reserved

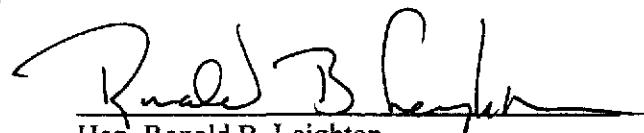
12
13 L. The Court should exclude any witnesses who were not disclosed by Ms.
14 Manning, or who were improperly disclosed by Ms. Manning in her Fed. R.
Civ. P. 26(a)(1) initial disclosures.

15 Granted Denied Reserved

16 M. The Court should exclude the "right to sue" letters issued to Ms. Manning
by the United States Equal Employment Opportunity Commission.

17 Granted Denied Reserved

18
19
20 Dated this 27th day of August, 2007.

21
22
23 
Hon. Ronald B. Leighton

24
25 (PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - 19

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

Two Union Square - 601 Union Street, Suite 4200
Seattle - WA - 98101 Tel. 206.652.3500 • Fax 206.652.3501

1
2
3 Presented by:

4 PATTERSON BUCHANAN FOBES
5 LEITCH KALZER & WAECHTER, P.S.
6

7 By: /s/
8 Patricia K. Buchanan, WSBA No. 19892
9 Sean D. Jackson, WSBA No. 33615
Patterson Buchanan Fobes Leitch
Kalzer & Waechter, P.S.
10 601 Union Street, Suite 4200
Seattle, WA 98101
Telephone: (206) 652-3500
Fax: (206) 652-3501
Email: pkb@pattersonbuchanan.com
11 Of Attorneys for Defendants
12
13
14
15
16
17
18
19
20
21
22
23
24
25

(PROPOSED) ORDER GRANTING DEFENDANTS'
MOTIONS IN LIMINE - 20

PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER

Two Union Square - 601 Union Street, Suite 4200
Seattle • WA • 98101 Tel. 206.652.3500 • Fax 206.652.3501

CERTIFICATE OF SERVICE

I, Sean D. Jackson, do declare that on August 20, 2007, I caused to be delivered via CM/ECF, this document to the following attorney of record:

D. Michael Shipley
14009 - 42nd Ave. East
Tacoma, WA 98446
Shipleylaw@aol.com

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

/s/
Sean D. Jackson

(PROPOSED) ORDER GRANTING DEFENDANTS' MOTIONS IN LIMINE - 21

**PATTERSON BUCHANAN
FOBES LEITCH KALZER & WAECHTER**

Two Union Square - 601 Union Street, Suite 4200
Seattle • WA • 98101 Tel. 206.652.3500 • Fax 206.652.3501